

EPA Comment Number: 550-103

Received: February 14, 2000

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cc:

Subject: Comments on President's Council's Food Safety Strategic Plan

Here are comments from the FSIS Technical Service Center.

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Attachment

Comments related to Docket No. OPP-00550
President's Council on Food Safety
Strategic Plan

The Food Safety and Inspection Service (FSIS) Technical Service Center (TSC) strongly supports the goals and objectives proposed in the January 7, 2000, draft of the preliminary Food Safety Strategic Plan by the President's Council on Food Safety. The current draft represents an improvement over the earlier version in that it identifies three clear goals that are conceptually distinct from one another. It also proposes clear objectives. The following comments are offered to help strengthen the plan and to target the utilization of resources to best accomplish the plan.

* Goal 1, Objective 5, action item 2: The action item proposes to encourage scientists from academic institutions to participate in governmental food safety and public health activities. The words, "to participate in applied efforts related to implementation of regulatory changes," should be added to this action item. This would ensure that some of the scientific expertise would reach the level of application that touches producers, plant operators, and consumers. Locations such as the TSC would be ideal for such an exchange. Federal employees would benefit by gaining access to current scientific information, and scientists would benefit by gaining a better understanding of how science can be applied to address

practical issues.

* Goal 1, Objective 5, action item 3: The action item states, "Establish extramural programs (e.g., Centers of Excellence) to conduct targeted research and develop training programs linked to food safety and public health." The wording of this item should be changed to, "Identify programs (e.g., Center of Excellence)." The former leads us to believe that there are no such centers in existence within our federal food safety system. FSIS believes that the TSC is one such center. There are likely other such centers in FDA and EPA. These programs should be identified by the food safety strategic plan and some mechanism should be established (e.g., steering committee, coordinating board) to encourage collaboration and cooperation between them. We would be happy to assist in such an effort.

* Goal 2, Objective 5, action item 1: This action item calls for developing a credentialing system for food safety inspectors, investigators, and program reviewers. FSIS has a program called the Certificate of Excellence that may be a model for implementing this type of action item. I offer this program for the Council's consideration. The person who oversees this program is Robert (Bob) Burke (phone 409-260-9560).

* Goal 2, Objective 9, action item 1: Instead of stating, "Strengthen assessments of foreign systems," this item should read, "Standardize and coordinate the assessments of foreign systems." This conveys the concept that a food safety assessment of foreign systems would be conducted with all U.S. agencies cooperating to maximize the utilization of federal resources. The FSIS TSC has expertise in this area (e.g., the FSIS foreign review and export staff) and we are willing to work with others to help achieve this action item.

* Goal 3, Objective 1: I suggest that we add the words, "and implementation," to this objective. The public is highly interested in the progress made with regard to the implementation of federal programs such as HACCP, as we learned when we implemented the HACCP Hotline. In addition, a great deal can be learned by sharing information about implementation. If we fail to communicate information about implementation, we will lose a very important opportunity to understand how to control food safety risks.

* Goal 3, Objective 1, action item 1: This action item proposes that we create a state-of-the-art national information network. When I read this, I ask these questions: What's included? Who's involved? How is access gained? Last year, FSIS proposed the creation of a National Center for Food Safety Information and Education. I understand that a similar proposal has surfaced among state level food safety professionals. The concept of this proposal is much like the one in this action item. The TSC would very much like to help lead such an effort. We currently communicate daily by phone, fax, and e-mail (primarily) with hundreds of other federal, state, and international food safety professionals. We would provide an excellent base for this type of operation.

* Goal 3, Objective 1, add an action item: I propose that the following action item be added. "Provide easy access to information regarding the implementation of regulatory changes." This suggestion follows one made earlier to add, "and implementation" to the objective. It would support the sharing of information about the implementation of regulatory changes. This would help consumers, producers, and plant operators understand how regulatory changes are making a difference in the effort to promote food safety. It would also help scientists understand what strategies work well, and what strategies need improvement when applied in real world settings.

* Goal 3, Objective 2, add an action item: I propose that an action item be added that states, "Develop an inventory of opportunities provided in terms of state-of-the-art science-based education and training

programs promoting food safety." This action item should be the first under the objective. Such an inventory is needed because it helps identify what is currently being done. It also can be used to promote information sharing among the groups that currently provide the training and education. The National Agricultural Library can provide a base for such an inventory. From an inventory like this, gaps can be identified and addressed in food safety training and education.

To demonstrate our interest and commitment to further the goals outlined in the plan, I offer several members of the TSC staff to assist the Council with the development of the action plan for implementing the Food Safety Strategic Plan. We see many opportunities in this plan to participate with our counterparts in other federal, state, and local agencies to help further the goal of promoting food safety. As the Council continues this effort, we hope it can find some way to utilize the knowledge and expertise we offer to the planning process. Please call me at 402-221-7400 and I will be happy to share some names of individuals who are willing to assist the Council.

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